

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

EUGENE SCALIA, Secretary of Labor,  
United States Department of Labor,<sup>1</sup>

Plaintiff,

v.

SWEET LEMON, INC. d/b/a SWEET  
LEMONS THAI RESTAURANT, and  
PORNTHIP NEAMPONG,

Defendants.

Civil Action No. 1:20-cv-12217-RGS

**DECLARATION OF EMILY V. WILKINSON**

I, Emily V. Wilkinson, declare pursuant to 28 U.S.C. § 1746 and under penalty of perjury that the following is true and correct:

1. I currently serve as a Trial Attorney in the Boston Regional Solicitor's Office, U.S. Department of Labor (the "DOL"). I am one of the DOL attorneys who represents the Secretary of Labor (the "Secretary") in this action.

2. A true and correct copy of excerpts of the transcript of the deposition of Defendant Pornthip Neampong, taken in this matter on October 26, 2021, is attached hereto as Exhibit 1. The deposition transcript has been redacted in accordance with the Stipulated Protective Order (Dkt. 18), which was entered in this case on December 9, 2021.

3. A true and correct copy of Defendants' Answers to the Secretary's First Set of Requests for Admission, dated July 25, 2021, is attached hereto as Exhibit 2.

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<sup>1</sup> Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Secretary of Labor Martin J. Walsh is automatically substituted as the proper Plaintiff in this case. For ease of reference, the Secretary and his pertinent predecessors will be referred to herein as the "Secretary."

4. A true and correct copy of excerpts of the transcript of the deposition of Defendant Sweet Lemon, Inc., taken in this matter on August 27, 2021 and October 26, 2021, is attached hereto as Exhibit 3. The deposition transcript has been redacted in accordance with the Stipulated Protective Order (Dkt. 18), which was entered in this case on December 9, 2021.

5. A true and correct copy of Defendants' Answers to the Secretary's First Set of Interrogatories, dated July 25, 2021, is attached hereto as Exhibit 4. The interrogatory responses have been redacted in accordance with the Stipulated Protective Order (Dkt. 18), which was entered in this case on December 9, 2021.

Executed on this 10th day of December, 2021.

/s/ Emily V. Wilkinson  
Emily V. Wilkinson